Williamsburg Receiving G.T. Co

INLAND SEAS ENGINEERING

PO Box 6820, Traverse City, MI 49696
1755 Barlow Street, Traverse City, MI 49686
Phone (231) 933-4041
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July 5, 2002

VIA FEDERAL EXPRESS
Mr. Richard Powers
Water Division Chief
Michigan Department of Environmental Quality (MDEQ)
Constitution Hall
P. O. Box 30473
Lansing, MI 48909-7973

Re: Williamsburg Receiving and Storage
Groundwater Discharge Permit # M 0086
Permit Modification Request
ISE Project #02633061-05E

Dear Mr. Powers:

Inland Seas Engineering, Inc. (ISE) has been retained by the Permitee, Williamsburg Receiving and Storage, to provide professional engineering services related to wastewater treatment and permit compliance. The Permitee has authorized ISE to formally petition MDEQ on their behalf for a modification to Permit # M 0086, which has been issued under Rule 2218. The Permitee formally requests modification of Permit # M 0086 in accordance with §323.2218(3)(d) and §323.2218(3)(e) of the Michigan Administrative Code (MAC).

BACKGROUND

Attached are copies of the current and original Wastewater Discharge Permit for this plant. The Original Permit (OP) was granted in August 1993 for wastewater generated by mixing spent cherry brine with dilution water. The spent brine and dilution water were then applied to a limited area of land adjacent to the plant.

Williamsburg Receiving and Storage operations include the following processes:

1. Cherry Receiving and Cherry Brining
2. Brine Cherry Stemming and Pitting
3. Cherry Finishing and Packing

Wastewater characteristics and process descriptions for the first two (2) processes were included in the Current Permit (CP) application, submitted in March, 2000. The CP was granted in April of 2001. The third process was introduced into the plant in January, 2002. Wastewater from all processes are combined and transmitted to an irrigation pond, constructed to store an entire year's wastewater production.

GENERAL RATIONALE FOR PERMIT MODIFICATION

Since the CP review did not include the characteristics of wastewater produced from Process #3, Permit Modification is requested. Combining effluent from Process #3 with the other processes will slightly modify the chemistry of the effluent currently permitted for discharge. This combined effluent require additional treatment [reference 323.2218(3)(e)]. Specifically, dilution and aeration will be incorporated into the current treatment system prior to land application of wastewater.

Aeration is proposed only to promote aerobic transformation of biodegradable carbohydrates which are a component of all three (3) processes. Maintaining aerobic conditions within the irrigation pond supports permit compliance as it will reduce the potential for undesirable odors associated with anaerobic conditions. Aerobic conditions will also support utilization of phosphorous and nitrogen by aerobes and facultative anaerobic organisms.

The addition of dilution treatment to the combined plant effluent will increase the daily and annual quantity of effluent requiring discharge, thus the reference to MAC §323.2218(3)(d). The dilution treatment is proposed to adjust the combined plant effluent chemistry so that limits established in the CP for effluent quality monitoring (TIN, Phosphorous and various dissolved solids) are met. No change or modification is requested for effluent quality or characteristics.

The addition of a dilution flow to the irrigation pond may not require any modification in CP limits for daily/annual flow or application rate. Current water production rates from the plant are sufficiently below CP limits that dilution water can likely be added without causing an exceedance in daily/annual flow limits. The appropriate dilution volume will be determined through laboratory analyses of samples subject to serial dilution prior to discharge. Permit Modification for an increase in daily and annual flow is requested as an added precaution to allow for growth in plant capacity for the duration of the CP, which is not slated for renewal under MAC §323.2218(3) until October 3, 2005.

No change or modification is requested for an increase in application rate. The CP considers two (2) discrete seasons of wastewater application and two (2) discrete modes of application each associated uniquely with a given season. Trickle Irrigation is permitted in the Fall and Winter, while Spray Irrigation is permitted in Spring and Summer. Permit Modification is requested to allow greater flexibility in the mode and duration of land application of the combined process wastewater.

Specifically, the Permitee requests Modification of the Permit to allow EITHER Trickle Irrigation or Spray Irrigation of wastewater in areas currently designated exclusively for each application mode. The Permitee also requests Permit Modification to allow land application rate limits within the CP to apply to each mode of application throughout the year thereby eliminating the seasonal change in application mode under the CP. The Permitee desires to elect for either mode at any time of the year at its sole discretion.

REQUESTED PERMIT MODIFICATIONS
Permit # M 0086 Section A.1.

EF-1

Flow (gals)	Original Permit	Current Permit	Modification	Proposed Limit
Daily	94,000	42,000	+ 14,000	56,000
Annual	8.0 E+6: 180 days	15.3E+6: 360 days	+ 4.86E+6	20.2E+6

LA-1

Land Application (in.)

SPRING/SUMMER	Original Permit	Current Permit	Modification	Proposed Limit
Daily	1.0	0.09	+ 0.31	0.4
Weekly	4.0	0.63	no change	0.63
Weekly Ave.	2.5	Not Limited	Not Limited	Not Limited
FALL/WINTER				
Daily	Not Permitted	0.4	no change	0.4
Weekly	Not Permitted	0.4	+ 0.23	0.63
Weekly Ave.	Not Permitted	Not Limited	Not Limited	Not Limited

The Permit Modification proposed will eliminate seasonal limits on discharge application rate with maximum daily and weekly application rates set at maximum for each season. Spray Irrigation and Trickle Irrigation may be applied to any area currently permitted as either "Spray" or "Trickle" Irrigation areas.

SPECIFIC RATIONAL FOR PERMIT MODIFICATION

Introduction of the cherry finishing processes in January 2002 resulted in an increase in the concentrations of dissolved solids in plant effluent relative to prior effluent production due to processes described in the CP application. When the Permitee became aware of the change in effluent chemistry through monitoring in compliance with its Permit, land application of effluent exceeding Permit limits ceased. No discharges of the combined plant effluent have occurred since the plant effluent sampling verified a change in plant effluent chemistry.

All processes operative at the plant generate wastewater with similar characteristics in terms of effluent quality or dissolved solids and nutrient composition. The only significant difference in wastewaters generated from each process are the concentrations of dissolved solids and nutrients in each waste stream, with the cherry finishing process yielding more concentrated effluent than stemming and pitting processes.

All dissolved waste constituents arise from the same source; introduction of brining solutions into process, wash and conveyance waters. Throughout each process brine is introduced into the processes as entrained brine residue on fruit and through leaching of dissolved solids, sugars and nutrients from the fruit as it is processed. The concentration of residual brine in each process wastewater is affected by the amount of dilution water introduced from each process.

Dilution and discharge of raw, spent brine and cherry leaching (finishing step) wastewater was once permitted at this location under the OP. The effluent limitations under the OP for dissolved solids and nutrients are essentially the same as those set in the CP. The Permitee proposes to maintain compliance with effluent quality limitations established in the CP by diluting the plant effluent.

The introduction of additional dilution waters in excess of the nominal dilution volume will increase the nominal plant flows to approach the daily and annual flow limits established in the CP. Permit Modification to increase daily and annual flow limits replaces the growth capacity contained in the CP which is proposed to be consumed by the additional dilution waters.

Food grade coloring and flavoring agents are also introduced into finishing process wastewater through process vessel cleansing. These trace constituents will be diluted in the same manner as nutrients and dissolved solids proposed for dilution. The aeration treatment process addition included in this Permit Modification petition will treat any BOD load added by the introduction of these substances which are all approved for human consumption by the federal Food and Drug Commission. Product information and material safety data sheets for food additives are available upon request.

No increase in hydraulic loading rate is requested. The flow and application rates in the CP are but a fraction of that permitted in the OP following MDNR review of the Hydrogeological Studies and Permit Application support documents for spent brine application. Currently, the Permitee controls or owns sufficient land for proper irrigation of the flows allowed under the CP and for those increased flows included in this Permit Modification petition.

Seasonal and modal limitations in the CP establish unnecessary limitations on land application of wastewater. Maintaining CP limits on maximum daily and weekly application rate, while allowing flexibility in application areas (no specific discharge mode) throughout the year simplifies the land application process and record keeping.

This proposed Permit Modification also allows the Permitee the opportunity to diagnose and re-engineer its trickle irrigation equipment which suffered operational problems upon initial trial. It also allows for more cost effective land application as the availability of improved spray irrigation equipment has been recently identified. Spray irrigation is currently practiced by numerous permitees in northern latitudes throughout the year without causing run-off, soil erosion or nuisance conditions. Monitoring of application areas under the CP will continue to assure a stable and effective land application process.

Please call me at (231) 933-4041 if you have any questions or require additional information.

Sincerely,
INLAND SEAS ENGINEERING, INC.

Andrew Smits, P.E.

enc. Original Permit M 0086
Current Permit M 0086

cc: Mr. Christopher Hubble- WRS
Mr. Richard Banwell- WRS
Mr. Edgar Roy III- BFA&R
Mr. Joseph Quandt- ZKDBT&Q
Mr. Thomas Egan, PE- ISE/tc
Mr. Phil Roycraft- MDEQ-WMD/Cadillac
Ms. Janice Heuer- MDEQ-WMD/Cadillac

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JOHN ENGLER, Governor
DEPARTMENT OF NATURAL RESOURCES
John Hannah Building, P.O. Box 30241, Lansing, MI 48909
ROLAND HARMES, Director

August 20, 1993

CERTIFIED MAIL

Mr. James Jensen
Gray and Company
503 Polk Road
Hart, Michigan 49420

Dear Mr. Jensen:

Enclosed is a copy of the State Permit No. M 00836 for Gray and Company which was approved for issuance by the Water Resources Commission on August 19, 1993 following the 30-day public comment period.

I wish to call your attention to the special conditions and requirements of the permit. If there are questions regarding the permit requirements, please contact the Groundwater Permits Section of our Waste Management Division.

Sincerely,

Joan H. Peck
Assistant Executive Secretary
Water Resources Commission
517-335-3383

Enclosure

cc: Jim Nordlund, Nordlund and Associates, Inc.
Brad Boals
Grand Traverse County Health Department
Whitewater Township Supervisor
Division of Environmental Health, MDPH
Cadillac District, WMD
Susan Anderson, WMD

MICHIGAN WATER RESOURCES COMMISSION

AUTHORIZATION TO DISCHARGE TO THE GROUNDWATERS OF THE STATE OF MICHIGAN

In compliance with the provisions of the Michigan Water Resources Commission Act, 1929 P.A. 245, as amended, (Act 245) and the administrative rules promulgated thereunder, being Sections 323.1 through 323.13 of the Compiled Laws of Michigan,

Gray and Company
503 Polk Road
Hart, Michigan 49420

is authorized to discharge a maximum 94,000 gallons per day (8 million gallons per year) of dilute cherry processing brine via spray irrigation in accordance with discharge limitations, monitoring requirements, and other conditions set forth in Parts I and II of this permit.

This permit takes effect immediately upon the date of issuance. Any person who feels aggrieved by this permit may file a sworn petition with the Water Resources Commission (Commission) setting forth the conditions of the permit which are being challenged and specifying the grounds for the challenge. The Commission may reject any petition filed more that 60 days after issuance as being untimely. Upon granting of a contested case to the applicant, the Commission shall review the permit to determine which contested terms shall be stayed until the Commission takes its final action. All other conditions of the permit remain in full effect. If the contested condition is a modification of a previous permit condition and the Commission determines the contested condition shall be stayed, then such previous condition remains in effect until the Commission takes final action. During the course of any administrative proceeding brought by a person other than the applicant, the conditions of this permit will remain in effect, unless the Commission decides otherwise.

This permit and the authorization to discharge shall expire at midnight on August 1, 1998. In order to receive authorization to discharge beyond the date of expiration, the permittee shall submit such information and forms as are required by the Michigan Water Resources Commission no later than 180 days prior to the date of expiration.

This permit is based on the permittee's application dated August 31, 1992, and shall supersede State Permit No. M 00836, issued September 20, 1990.

Issued this 19th day of August 1993, for the Michigan Water Resources Commission.

Joan H. Peck
Assistant Executive Secretary
Water Resources Commission

PERMIT CONDITIONS

PART I

A. DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

1. Authorization

During the period beginning with the issuance of this permit and lasting until August 1, 1998 the permittee is authorized to discharge a maximum 94,000 gallons per day (8 million gallons per year) of dilute cherry processing brine wastewater to the ground at a site located in the SW 1/4 of the SW 1/4 of Section 9, T28N, R9W, Whitewater Township, Grand Traverse County, Michigan.

2. Wastewater Limitations and Monitoring Requirements

The fruit processing wastewater and irrigation fields shall be limited and monitored by the permittee as specified below. Analyses and inspections shall be conducted for the parameters listed below at least at the frequencies indicated. Reports of such monitoring shall be submitted to the Michigan Department of Natural Resources in accordance with Part I, Section E of this permit. Irrigation fields shall be designated as Fields 1, 2 and 3.

Sample/Monitoring and Location	Limitations	Measurement Frequency	Sample Type
Process Wastewater Irrigation Flow			
Daily (gal/day)	94,000 (max.)	Weekly	Total
Yearly (gal/year)	8,000,000 (max.)	Yearly	Total
pH (S.U.)	6.0 to 8.0	Twice Monthly*	Grab
Sodium	150 mg/l	Twice Monthly*	Grab
Chloride	250 mg/l	Twice Monthly*	Grab
Sulfate	250 mg/l	Twice Monthly*	Grab
Phosphorus	4 mg/l	Twice Monthly*	Grab
Total Inorganic Nitrogen**	5 mg/l	Twice Monthly*	Calculation
Ammonia-Nitrogen		Twice Monthly*	Grab
Nitrate-Nitrogen		Twice Monthly*	Grab
Nitrite-Nitrogen		Twice Monthly*	Grab

(continued on following page)

Sample/Monitoring and Location	Limitations	Measurement Frequency	Sample Type
Irrigation Fields			
Irrigation Season: May 1 through October 31			
Irrigation Rate	1 in/day (max.)	Weekly	Measured or Calculated
	2.5 in/week (monthly average)	Monthly	Calculated
	4.0 in/week (max.)	Weekly	Measured or Calculated
Inspection		Daily during discharge	Visual Observation
Soil pH***	6.1-7.5 S.U.	****	Grab
Soil Testing***		Annual	Grab
Brine Pits			
Freeboard	1 ft. (min.)	Weekly	Visual Observation
Inspection		Daily during discharge	Visual Observation

*Effluent samples shall be collected from the batch mixing tank.

**Total Inorganic Nitrogen is the total of ammonia plus nitrate plus nitrite, expressed as nitrogen. This limitation is based on best available technology. The limit may be lowered should economically available technology or management practices be developed.

***Soil tests shall be conducted and reported in accordance with the methods and procedures described in Part I, Section D.3 of this permit. The initial soil testing shall be conducted in 1994. Soil testing results shall be submitted by May 15 of the year in which the soil testing was conducted.

****Soil pH for each irrigation field shall be submitted by May 15, August 15 and November 15 each year.

3. Irrigation Management

The permittee shall irrigate fruit processing wastewater in accordance with the following restrictions, at a minimum:

a. In no case shall fruit processing wastewater be irrigated in a manner that results in pooling or runoff of the wastewater.

b. Irrigation areas shall be inspected daily during discharge prior to, during, and after irrigation to make an evaluation of pooling, ponding, runoff, and odors. In the case of runoff off-site occurring, irrigation to the area in use shall be discontinued immediately and provisions made to repair erosion conditions and prevent reoccurrence of runoff (i.e., lessen use of the area, build berms, etc.).

c. Sprinklers shall be examined daily during discharge to assure that they operate properly and are not clogged.

d. In no case shall the operation of the disposal site create a nuisance odor condition that may cause for neighbors an "unreasonable interference with the comfortable enjoyment of life and property".

e. Fruit processing wastewater shall not be applied within 150 feet of private drinking water wells, and 150 feet from property lines, unless the owner of the adjacent land gives written consent to application up to 50 feet from the property line. In no case shall fruit processing wastewater be applied within 50 feet of the property line. The isolation distances shall be measured from the periphery of the spray area, not from the sprinkler heads.

f. The spray irrigation fields shall be under active cultivation and occupied by a crop which is to be harvested at least once per year.

g. The soil in the irrigation fields shall be allowed to drain and aerate for a rest period equal to or greater than the amount of time that the irrigation takes place on a weekly basis.

4. Brine Pit Inspection

Any problems with dike integrity (for example, erosion or animal burrowing) shall be reported immediately to the Waste Management Division District Office. Vegetation shall be kept groomed to discourage animal burrowing. Adequate freeboard shall be maintained to prevent brine pit overtopping.

5. Other Monitoring Programs

Other wastewater monitoring programs may be substituted for the one required above if required or approved by the Waste Management Division, Michigan Department of Natural Resources.

B. GROUNDWATER LIMITATIONS AND MONITORING REQUIREMENTS

1. Groundwater Monitoring Program

The groundwater monitoring program shall consist of at least thirteen (13) monitor wells located adjacent to the brine pits and the proposed irrigation field.

2. Groundwater Limitations and Monitoring Requirements

The disposal of fruit processing wastewater shall not cause the groundwater quality to exceed the limitations listed below.

All groundwater monitoring wells shall be sampled and the groundwater analyzed for the parameters listed below at least at the frequencies indicated. Reports of such monitoring shall be submitted to the Department of Natural Resources on a monthly basis in accordance with Part I, Section E of this permit. The monitoring wells shall be designated MW-A, MW-B, MW-C, MW-E, MW-F, MW-G, MW-H, MW-I, MW-J, MW-K and MW-L.

PARAMETERS	CONCENTRATION LIMITATIONS	FREQUENCY OF ANALYSIS	SAMPLE TYPE
Static Water Elevation		Quarterly	Reduced to USGS Datum
pH		Quarterly	Grab
Dissolved Sodium	150 mg/l	Quarterly	Grab
Chloride	250 mg/l	Quarterly	Grab
Specific Conductance		Annual	Grab
Total Inorganic Nitrogen*	5 mg/l	Quarterly	Calculation
Ammonia Nitrogen		Quarterly	Grab
Nitrate Nitrogen		Quarterly	Grab
Nitrite Nitrogen		Quarterly	Grab
Dissolved Calcium		Annual	Grab
Dissolved Magnesium		Annual	Grab
Dissolved Potassium		Annual	Grab
Dissolved Iron		Annual	Grab
Sulfate	250 mg/l	Quarterly	Grab
Bicarbonate		Annual	Grab
Total Phosphorus	1 mg/l	Quarterly	Grab

*Total inorganic nitrogen is the total of ammonia plus nitrate plus nitrite, expressed as nitrogen. This limitation is based on best available technology. The limit may be lowered should economically available technology or management practices be developed.

Quarterly monitoring shall be done in the months of March, June, September and December. Annual monitoring shall occur in September.

3. Other Monitoring Programs

Other groundwater monitoring programs may be substituted for the one required above if required or approved by the Waste Management Division, Michigan Department of Natural Resources.

4. Static Water Elevation Measurement

   a. Water level measurements are to be made under static conditions prior to pumping for sample collection.

   b. Water levels shall be determined by methods giving precision to 1/8" or 0.01'. (Example: wetted tape method.)

   c. Measurements shall be made from the top of the casing with the elevation of all casings in the monitor well system related to a permanent reference point, using United States Geological Survey (USGS) datum. Static water level shall be reported as an elevation reduced to USGS datum.

   d. All wells shall be securely capped when not in use.

5. Sample Collection From Monitor Wells

   a. Well purging equipment and sampling techniques must be such that collection of the groundwater sample does not significantly alter the water chemistry.

   b. An adequate amount of water necessary to collect a representative sample (but not less than three times the amount of water in the well and gravel pack) shall be exhausted from the well before taking a sample for analysis. In the case of very low permeability soils the well may have to be exhausted and allowed to refill before a sample is collected. As soon as enough water is available in the well, a sample shall be collected.

   c. Bailing and pumping equipment shall be thoroughly cleaned and rinsed before use in each monitor well.

   d. A pressure tank shall not be used with a sampling system since the water in the pressure tank would be particularly difficult to exhaust.

   e. Water pumped from each monitor well should be disposed of according to a sampling and analysis plan approved by the Hydrogeologic Review Unit, Groundwater Section, Waste Management Division.

   f. Samples must be collected, stored, and transported to the laboratory in a manner consistent with Part I, Section E of this permit.

C. SCHEDULE OF COMPLIANCE

1. Construction Schedule

a. Approval of Plans

Prior to construction of any new or modified wastewater treatment system, the permittee shall obtain approval of plans and specifications from the Waste Management Division, Michigan Department of Natural Resources.

b. Commencement of Construction

The permittee shall notify the Waste Management Division, Michigan Department of Natural Resources in writing of the proposed schedule for construction of any new or modified wastewater treatment facilities at least two (2) weeks prior to commencing construction.

c. Construction Certification

Upon completion of the construction or modification of any facilities the permittee shall notify in writing to the Waste Management Division, Michigan Department of Natural Resources that the facilities are constructed in accordance with the approved plans and specifications.

d. Start-Up Notification

The permittee shall give the Waste Management Division, Michigan Department of Natural Resources written notification prior to the date of the start-up of any new or modified facilities. This notification requirement only applies to facility expansion, production increases, process modifications, or other changes in operations or conditions which will not result in a new or increased volume or change in composition of the discharge. Changes which will result in a new or increased volume or change in composition of the discharge must be authorized by a new permit or modification of this permit, as required in Part II, Section A.1.

2. Groundwater Monitor Well Installation

Monitor wells shall be installed in accordance with the following schedule. All submittals shall be forwarded to the Waste Management Division, Michigan Department of Natural Resources for approval.

a. By September 30, 1993, the permittee shall submit to the Waste Management Division, Groundwater Section, Department of Natural Resources, a workplan for the installation of monitor wells MW-K and MW-L. The workplan shall include the proposed location of the well(s), well construction materials, installation methods (including annular sealing) and the depth and USGS screened interval for each well.

b. Within 90 days of approval of the workplan described above, the permittee shall install the monitor wells according to the workplan approved by the Hydrogeologic Review Unit, Groundwater Section, Waste Management Division, Department of Natural Resources.

c. Within 30 days of completion of the installation of the monitor wells, the permittee shall submit to the Groundwater Section, Waste Management Division, Department of Natural Resources, copies of all well logs for observation and monitor wells installed at the facility, a table of USGS ground, top of casing and screened interval elevations for each well at the facility, a map showing the surveyed locations of all wells on site and an updated groundwater contour map, incorporating static water levels from all wells on site. Well location information shall be verified annually.

3. Background Groundwater Quality Data

All groundwater monitor wells shall be sampled and tested monthly for all parameters given in Part I, Section B of this permit for the first six (6) months following installation of the well (or following the date of issuance of this permit, if the wells are existing and this data has not previously been obtained). After this background data has been obtained, the frequency of analysis shall be as stated in Part I, Section B of this permit.

4. Irrigation Management Plan

Within 90 days of issuance of this permit the permittee shall submit to and receive approval from the Waste Management Division, Michigan Department of Natural Resources for an Irrigation Management Plan describing the fields proposed for irrigation of fruit processing wastewater. The report shall include: a location map; a site map indicating buffer zones, soil series, slope, proposed crops and irrigation rates and a description of procedures which will assure that effluent limitations contained in Part I.A.2. of this permit will be met.

The plan shall also include procedures for routine maintenance and inspection of equipment used for irrigation. Any changes from the approved irrigation management plan must receive approval from the Waste Management Division, Michigan Department of Natural Resources prior to implementation. Any operation inconsistent with the approved Irrigation Management Plan shall be considered a violation of this permit.

D. SPECIAL CONDITIONS

1. Odor Control

a. In no case shall fruit processing wastewater be transported, stored or irrigated in a manner that creates a nuisance odor condition or causes for neighbors an "unreasonable interference with the comfortable enjoyment of life and property".

b. After a determination by and written notification from the Chief, Waste Management Division, in consultation with the Air Quality Division, that fugitive odor emissions from the permittee's operations conducted pursuant to this permit are causing an unreasonable interference with the common public right to live free from foul or noxious odors, the permittee shall immediately cease the operations until the cause of the odors can be corrected to the satisfaction of the Chief, Waste Management Division, Michigan Department of Natural Resources. The notification shall include the reasons for this determination. The permittee shall within two weeks of notification submit an odor control plan for approval by the Chief of the Waste Management Division. The permittee shall not restart the operations until the Chief of the Waste Management Division has approved the restart in writing. Information submitted by the permittee indicating the odors have been eliminated shall be evaluated by the Waste Management Division as expeditiously as possible. The Chief of the Waste Management Division may require an upgrade of the waste disposal system in order to accomplish odor control.

2. Closure Plan

a. Submittal of Plan

In the event that all or partial discharges from the facility are planned to be eliminated, the permittee shall submit for approval a closure plan to the Cadillac District Office of the Waste Management Division, Michigan Department of Natural Resources for the wastewater treatment and disposal areas. This plan shall be submitted at least 180 days prior to the planned closure. The closure plan cannot be implemented without approval of the Cadillac District Office of the Waste Management Division, Michigan Department of Natural Resources.

In the event of an unforeseen partial or total elimination of discharge from the facility, the permittee shall retain responsibility for closure requirements.

b. Criteria

The closure plan shall include:

1. Characterization of wastewater and residuals (sampling, parameters).

2. Disposal methods (pump-and-haul, landfilling, land application, based on characterization).

*3. Site remediation (extent of contamination, scope of remediation).

*4. Site restoration (backfilling, final cover, scraping, future use).

*5. Post-closure groundwater monitoring proposal (number and location of monitoring wells, parameters, monitoring frequency, duration of monitoring program).

6. Schedule for implementation of closure activities (time frame).

*if appropriate

c. Notification

The permittee shall notify the Cadillac District Office of the Waste Management Division, Michigan Department of Natural Resources in writing of the proposed implementation of closure activities at least four (4) weeks prior to commencing closure activities.

d. Closure

Closure shall be accomplished in accordance with the approved plan and its schedule.

e. Certification

Within 30 days of completion of the closure of the wastewater treatment and disposal areas, the permittee shall certify in writing to the Cadillac District Office of the Waste Management Division, Michigan Department of Natural Resources that the facilities were closed in accordance with the approved closure plan.

The certification shall include the submittal of sample results for materials removed, disposal documents (if applicable) or other records indicating the volume removed and disposal location, proposed site remediation (if required), and the proposed groundwater monitoring plan outlining well locations and water quality data.

3. Soil Testing

Initial and annual soil tests shall be performed on irrigation fields as follows:

a. A soil fertility test shall be performed on samples from each approved field. Test parameters shall include but are not limited to phosphorus (Bray P_1).

b. Soil sampling methods shall be in accordance with "Sampling Soils", Extension Bulletin E-498, July 1975, Michigan State University.

c. The results of annual tests shall be submitted to the Waste Management Division on or before May 15 of each test year beginning in 1994. The report shall also describe the fertilizer application on each field for the preceding year.

4. Soil Phosphorus Limitations

If representative soil test levels for phosphorus (Bray P_1) reach 75 ppm (150 lbs/ac), the permittee shall notify the Waste Management Division in writing and the Waste Management Division may direct the permittee to conduct a phosphorus adsorption capacity evaluation of the site in accordance with the Langmuir Adsorption Equation (Langmuir Isotherm) procedure and the Bray (P_1) Method. Other methods may be substituted with the approval of the Waste Management Division. If upon reviewing such an evaluation the Waste Management Division determines that the soils will no longer adequately remove phosphorus from the wastewater effluent, the permittee shall, within six months of

notification, submit to the Waste Management Division and receive approval of plans and specifications for a system capable of removing the phosphorus to the limitation contained in this permit. The permittee shall have twelve months from the date the plans and specifications have been approved by the Department, to install the treatment system capable of removing phosphorus and have it operational.

5. Irrigation Record

The permittee shall maintain a log which details the length of time irrigation occurs on each irrigation field and the subsequent rest period as required in Part I.A.3.g. The log shall be available for inspection by Department of Natural Resources staff.

E. OTHER REPORTING AND MONITORING REQUIREMENTS

1. Reporting

a. The permittee shall effectively monitor the operation of all processes comprising the treatment and control facilities. Monitoring data required by this permit and other data required by the Waste Management Division, Michigan Department of Natural Resources shall be tabulated and summarized on a calendar month basis. Monthly reports, on forms or format supplied by the Department of Natural Resources, shall be mailed to the address below, postmarked no later than the tenth of the first month following the report period:

Michigan Department of Natural Resources
Waste Management Division
Groundwater Section
P. O. Box 30241
Lansing, Michigan 48909

2. Other reports, notifications, and questions regarding this permit should be addressed to:

Waste Management Division
Groundwater Section
Michigan Department of Natural Resources
P. O. Box 30241
Lansing, Michigan 48909
Telephone: 517-373-8148

or

Cadillac District Office
Waste Management Division
Michigan Department of Natural Resources
8015 S. Mackinaw Trail
Cadillac, Michigan 49601
Telephone: 616-775-9728

3. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge.

4. Analyses of Samples

The wastewater analyses performed to meet the terms of this permit shall be performed in accordance with the appropriate procedures in Guidelines Establishing Test Procedures for the Analysis of Pollutants, (40 CFR, Part 136. Groundwater samples shall be collected and analyzed in accordance with Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, EPA Publication SW-846, Third Edition (1986).

If a test procedure is not included in this reference, the Waste Management Division, Michigan Department of Natural Resources may designate an acceptable test procedure.

Alternate methods may be used only when approved in writing by the Waste Management Division, Michigan Department of Natural Resources.

5. Records of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

a. The exact place, date, and time of sampling;

b. The dates the analyses were performed;

c. The person(s) who performed the analyses;

d. The analytical techniques or methods used; and

e. The results of all required analyses.

6. Definitions

a. The monthly average discharge is defined as the total discharge by weight, or concentration if specified, during the reporting month divided by the number of days in the reporting month that the discharge occurred. When less than daily sampling occurs, the monthly average discharge shall be determined by the summation of the measured daily discharge by weight, or concentration if specified, divided by the number of days during the reporting month when the samples were collected, analyzed and reported.

b. The daily maximum discharge means the total discharge by weight, or concentration if specified, during any calendar day.

7. Additional Monitoring by Permittee

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the calculation and reporting of the values required in the Monthly Operating Report.

8. Calibration and Maintenance

The permittee shall periodically calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals to insure accuracy of measurements.

9. Records Retention

All records and information resulting from the monitoring activities required by this permit including all records of analyses performed and calibration and maintenance of instrumentation and recordings from continuous monitoring instrumentation shall be retained for a minimum of three (3) years, or longer if required by the Waste Management Division, Michigan Department of Natural Resources.

PART II

A. MANAGEMENT REQUIREMENTS

1. Change in Discharge

All discharges shall be consistent with the terms and conditions of this permit. Any facility expansion, production increases, process modifications, or other changes in operations or conditions which may result in a new or increased volume or change in composition of the discharge must be authorized by a new permit or modification of this permit. The permittee must notify the Waste Management Division, Michigan Department of Natural Resources of any anticipated change in the discharge by submission of a new application for a discharge permit 180 days before the change, in accordance with Rules 323.2149(b) and 2106(2), Part 21 of the General Rules of the Water Resources Commission.

2. Groundwater and Surface Water Protection

Wastewater shall be disposed of into or on the ground in such manner and by means of such facilities and at such location that it shall not injuriously affect public health or welfare, or commercial, industrial, domestic, agricultural, recreational, or other uses of the groundwater or surface waters of the state, nor cause nuisance conditions such as, but not limited to odors. Disposal of wastewater by methods or at locations other than those specifically authorized by this permit are prohibited.

3. Facilities Operation

a. The permittee shall at all times maintain in good working order and operate as efficiently as possible, all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit. In the event the permittee is unable to achieve compliance with the terms and conditions of this permit, the permittee shall halt, reduce or otherwise control the operation to the extent necessary to achieve compliance with the terms and conditions of this permit.

b. The permittee shall provide an adequate operating staff which is qualified to carry out the operation, maintenance, and testing functions required to insure compliance with this permit.

c. Under no circumstances shall the permittee allow introduction of the following wastes into the waste treatment system:

(1) Wastes which create or can create a fire or explosion hazard-defined as being greater than 20% of the lower explosive limit (LEL) for the substance.

(2) Wastes which create or cause corrosive structural damage.

(3) Wastes with pH lower than 5.0 or greater than 11.0.

(4) Solid or viscous substances in amounts which cause obstructions to the flow or interference with the proper operation of the treatment works.

(5) Any pollutant, including oxygen demanding substances released in a discharge of such volume or strength which causes interference in the treatment works.

(6) Heat in such amounts that biological activity is inhibited at the treatment works resulting in interference. The discharge of heat must be regulated so that the temperature at the treatment works influent does not exceed 40°C (104°F).

4. Operator Certification

The wastewater treatment facilities or control system shall be under the supervision of an operator certified in the appropriate classification by the Michigan Water Resources Commission as required by Section 6(a) of Act 245, Public Acts of 1929, as amended, or under the direct supervision by contract with an operator certified in the appropriate classification under Act 98, Public Acts of 1913, as amended.

5. Waste Treatment Residues

Sludges, residues, filter backwashes, or other pollutants removed from, or resulting from treatment or control of wastewaters, shall be disposed of in accordance with plans submitted to and approved by the Cadillac District Office of the Waste Management Division, Michigan Department of Natural Resources.

6. Containment Facilities

The permittee shall provide approved facilities and control procedures for containment of any accidental losses of concentrated solutions, acids, alkalies, salts, oils, or other polluting materials, in accordance with plans submitted to and approved by the Waste Management Division, Michigan Department of Natural Resources.

7. Spill Notification

Any losses of any polluting material to the groundwaters or surface water shall be reported immediately to the District Office of the Waste Management Division or the 24-hour Pollution Emergency Alerting System (PEAS) 1-800-292-4706. Within ten (10) days, a written report shall be filed with the Waste Management Division detailing the quantities and material lost, the method of recovery, and what steps are being taken including a time schedule, to prevent a recurrence.

8. Noncompliance Notification

If, for any reason, the permittee does not comply with or will be unable to comply with any condition specified in this permit, the permittee shall notify the Waste Management Division, Michigan Department of Natural Resources immediately. The following information shall be submitted in writing with the next monthly operation report.

a. A description of the circumstances and cause of noncompliance; and

b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated times the noncompliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the noncompliance.

9. Adverse Impact

The permittee shall take all reasonable steps to minimize any adverse impact to waters of the state resulting from noncompliance with any condition of this permit. Such steps may include additional monitoring as necessary to determine the nature and impact of the noncompliance.

10. By-Passing

Any diversion from or bypass of facilities necessary to maintain compliance with the terms and conditions of this permit is prohibited, except where unavoidable to prevent loss of life, personal injury or severe property damage. The permittee shall promptly notify the Waste Management Division, Michigan Department of Natural Resources of any such occurrence by telephone at 1-800-292-4706. Such notice shall be supplemented by a written report with the next operation report detailing the cause of such diversion or bypass and the corrective actions taken to minimize adverse impact and eliminate the need for future diversion or bypass.

B. RESPONSIBILITIES

1. Right of Entry

The permittee shall allow the authorized representatives of the Michigan Department of Natural Resources upon presentation of their credentials:

a. To enter upon the permittee's premises where a discharge source is located or in which any records are required to be kept under the terms and conditions of this permit; and

b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any process facilities, treatment works, monitoring methods or equipment and to sample any discharge authorized by this permit.

2. Transfer of Ownership or Control

In the event of any change in control of ownership of facilities from which the authorized discharge emanates, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Waste Management Division, Michigan Department of Natural Resources.

3. Availability of Reports

All reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Waste Management Division, Michigan Department of Natural Resources. Knowingly making any false statement on any such report may result in the imposition of criminal penalties as provided for in Sections 7 and 10 of the Water Resources Commission Act, Act 245, Public Acts of 1929, as amended.

4. Permit Modification

After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to, the following:

a. Violation of any terms or conditions of this permit;

b. Obtaining this permit by misrepresentation or failure to disclose fully, all relevant facts;

c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

5. Toxic Pollutants

Notwithstanding Part II, B-4 above, if a toxic effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is established for a toxic pollutant which is present in the discharge and such standard or prohibition is more stringent than any limitation for such pollutant in this permit, this permit shall be revised or modified in accordance with the toxic effluent standard or prohibition and the permittee so notified.

6. Civil and Criminal Liability

Except as provided in permit conditions on "By-Passing" (Part II, Section A.10) nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance, whether or not such noncompliance is due to factors beyond his control, such as accidents, equipment breakdowns, or natural disasters.

7. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges nor does it authorize any injury to private property or any invasion of personal rights, nor infringement of federal, state or local laws or regulations.

8. Environmental Remediation

This permit is issued in reliance upon information provided in the permittee's application. Nothing in this permit shall be construed as allowing a discharge prohibited under state or federal law, or as license to impair the natural resources of the State. The State reserves the right to bring appropriate action against the permittee for violation of state or federal law, for recovery of costs, penalties, fines, environmental damages, or impairment of resources resulting from past or present discharges, including, but not limited to, surface water, soils, or groundwater contamination on, or emanating from, the permittee's facility.

9. Other Permits and Clearances

The issuance of this permit does not relieve the permittee of the responsibility of obtaining other permits or approvals as may be required by federal or state laws or local ordinances.

This permit does not authorize or approve the construction of any physical structures or facilities, the modification of any existing wastewater facility, or the undertaking of any work in any navigable waters.

10. Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstances, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

11. Facility Construction

This permit does not authorize or approve the construction of any physical structures or facilities, the modification of any existing wastewater facility. Approval for such construction must be: by permit under Act 98, Public Acts of 1913 as amended (MCL 325.201-325.214) if the facility is municipal or by notification from the Waste Management Division.

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE MANAGEMENT DIVISION

GROUNDWATER DISCHARGE PERMIT

This permit is issued under the provisions of Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, being Sections 324.3101 through 324.3119 of the Compiled Laws of Michigan, and the Administrative Rules promulgated thereunder. This permit does not relieve the permittee from obtaining and complying with any other permits required under local, state, or federal law.

Permit Number:	M00836	**Authorization Rule:**	2218
Facility Name:	Williamsburg Receiving and Storage, Inc.		
Issue Date:	April 25, 2001	**Expiration Date:**	April 1, 2006
Deadline for Submittal of Renewal Application:	October 3, 2005		
Facility Address:	10190 Munro Road, Williamsburg, Michigan 49690		
Telephone:	231-264-5260	**Fax:**	231-264-8774
Discharge Location Description:	SW 1/4, Section 9 and the NW 1/4, Section 16, T28N, R9W, Whitewater Township, Grand Traverse County, Michigan, as identified in Attachment 1 (Location Map) and fully described in this permit.		
Permittee Name:	Williamsburg Receiving and Storage, Inc.		
Facility Owner Address:	10190 Munro Road, Williamsburg, Michigan 49690		
Telephone:	231-264-5260	**Fax:**	231-264-8774
Authorization to discharge a maximum 15,300,000 Gallons Per Year in accordance with the limitations, monitoring requirements, and other conditions as set forth in this permit, Part 31, and it's administrative rules.			
Type of Wastewater:	Process Water	**Method of Treatment:**	Land Application - A1a
Method of Disposal:	Spray Irrigation - A1F1		

All construction, maintenance, operations, and monitoring of this facility must comply with the conditions set forth in this permit or in plans approved by the Department in accordance with this permit. Failure to comply with the terms and provisions of this permit may result in civil and/or criminal penalties as provided in Part 31.

This permit is based upon the information submitted in the March 28, 2000 application for groundwater discharge received by the Michigan Department of Environmental Quality and any subsequent amendments. This permit supersedes Permit M 00836 issued to Gray & Company on August 18, 1993.

Issued this 25th day of April 2001 for the Michigan Department of Environmental Quality.

L. C. Lee

Lonnie C. Lee, Chief, Groundwater Program Section
Waste Management Division
Michigan Department of Environmental Quality

A. Effluent Limitations and Monitoring Requirements

1. The wastewater discharge shall be limited and monitored by the permittee, at a minimum, as specified below and at sampling location identified in Attachment 2 (Site Map). The permittee shall submit reports quarterly as specified in Section F.1. of this permit. In the event of any non-compliance of limitations, including any detected in additional sampling to the minimum required below, the permittee shall fulfill the requirements of Section D.1. of this permit and Rule 2227.

SAMPLE LOCATION ID	PARAMETER	LIMITATION UNITS	MEASUREMENT FREQUENCY	SAMPLE TYPE
Effluent				
EF-1	Flow	42,000 GPD	Weekly	Calculation
		15.3 MGY	Weekly	Calculation
EQ-1	Total Inorganic Nitrogen	5 mg/l	Monthly	Calculation: Ammonia (N) + Nitrate (N) + Nitrite (N)
	Ammonia Nitrogen		Monthly	Grab
	Nitrate Nitrogen		Monthly	Grab
	Nitrite Nitrogen		Monthly	Grab
	Specific Conductance	umhos/cm	Weekly	Grab
	Sulfate	250 mg/l	Monthly	Grab
	Sodium	150 mg/l	Monthly	Grab
	Chloride	250 mg/l	Monthly	Grab
	Total Phosphorus	1 mg/l	Monthly	Grab
Land Application				
LA-1	Spring and Summer Irrigation Season (May through September)			
	Daily Irrigation Rate	0.09 inches/day	Weekly	Calculation
	Weekly Irrigation Rate	0.63 inches/week	Weekly	Calculation
LA-2	Fall and Winter Irrigation Season (October through April)			
	Daily Irrigation Rate	0.4 inches/day	Weekly	Calculation
	Weekly Irrigation Rate	0.4 inches/week	Weekly	Calculation
S-1 Soils	Bray P1		Biennial	Grab

B. Observation Monitoring Requirements

The permittee shall inspect the treatment and disposal facilities for the operational conditions required below at the minimum frequency specified. All inspections shall be documented in a logbook to be maintained at the on-site facility and shall be available for review by Department personnel at all times.

LOCATION	CONDITION	MEASUREMENT FREQUENCY	SAMPLE TYPE
Irrigation Fields	Ponding, Pooling, Erosion	Daily During Discharge	Visual Observation
	Odors	Daily During Discharge	Olfactory Observation
	Piping and Sprinkler Heads	Daily During Discharge	Visual Observation
Lagoon	Dike Integrity	Weekly	Visual Observation
	Vegetation Control	Weekly	Visual Observation
	Nuisance Animals, Birds, Insects	Weekly	Visual Observation
	Freeboard (2 ft. minimum)	Weekly	Visual Observation
	Odors	Weekly	Olfactory Observation

C. Compliance Requirements If Permit Limits Are Exceeded

If a limit described in Section A.1. is exceeded, the discharger shall comply with Rule 2227and undertake the following within the specified timeframes indicated below:

1. Provide written notification to the Department at the address in Section F.2. of this permit, within seven calendar days that a limit has been exceeded. Such notification shall include the name of the substance(s), the concentration(s), and the location(s) that exceeded the limit(s).

2. Resample and analyze for the parameter(s) of concern within 14 days at the location where a limit was exceeded.

3. Submit a report to the Department at the address in Section F.2. of this permit within 60 days. Such report shall include the results of confirmation sampling, an evaluation of the reasons for the limit being exceeded, and the steps taken or proposed to prevent recurrences.

4. Complete additional activities as may be required by the Department pursuant to Rule 2227(1)(d).

D. **Schedule of Activities** – The permittee shall undertake the following activities by the dates specified.

1. Within 60 day of permit issuance the permittee shall submit to and receive the Department approval for an Operation and Maintenance Manual for the wastewater disposal facilities. [Rule 2218 (4)(b)]

2. Provide written notification to the Department at least ten (10) days prior to facility start-up.

E. **Reporting Requirements – Rule 2225**

1. All monitoring data as required and specified by this permit shall be submitted quarterly on a form provided by the Department by the 15th of the month following each calendar quarter (April 15th, July 15th, October 15th, and January 15th). Quarterly Monitoring Reports shall be submitted to the following address:

   Groundwater Program Section
   Waste Management Division
   Department of Environmental Quality
   P.O. Box 30166
   Lansing, Michigan 48909 Telephone: 517-373-8148

2. All other notices, plans, reports, and other submissions required by and pursuant to this permit shall be submitted to the following:

   Cadillac District Supervisor
   Waste Management Division
   Department of Environmental Quality
   120 W. Chapin Street
   Cadillac, Michigan 49601 Telephone: 616-775-3960

F. Other Conditions

1. If the permittee does not own land where the discharge occurs, the permittee shall obtain a written agreement from the property owner and submit a copy of the agreement to the Department on an annual basis by January 2nd of each year.

2. Effluent shall not be applied within 100 feet from property lines unless the owner of the adjacent land gives written consent to application up to 50 feet from the property line. Irrigation shall be stopped immediately if aerosol drift is detected beyond the isolation distance specified.

3. Effluent shall be isolated from water supply wells as specified in Rule 2204(2)(d).

4. The permittee shall maintain all treatment or control facilities or systems installed or used by the discharger to achieve compliance with this permit in good working order and operate the facilities or systems as effectively as possible.

G. **Approved Documents** – The following documents, previously submitted and approved are incorporated into this permit by reference. These documents, and those submitted and approved under Section E of this Permit, may be modified upon written approval of the Department.

1. Irrigation Management Plan – dated March 28, 2000

H. **Permit Application** – Issuance of this permit is based upon the information submitted on the Application for Groundwater Discharge (Application) and any subsequent amendments received by the Department. Any material or intentional inaccuracies found in this information, or omissions of material information, may be grounds for the revocation or modification of this permit or other enforcement action. The permittee shall inform the Department's Waste Management Division, Cadillac District Supervisor, of any known material or intentional inaccuracies in the information of the Application which would affect the permittee's ability to comply with the applicable rules or license conditions. The following documents were submitted to the Department as part of the Application:

1. Basis of Design – dated March 28, 2000.

2. Waste Characterization – dated February 25, 2000.

I. **Transfer of Ownership** – The permittee shall notify the Department, in writing, no less than 30 days before a change in ownership of the facility. This permit may be transferred to the new owner by written approval of the Chief of the Groundwater Program Section, Waste Management Division.

J. **Change or Modification of Treatment or Discharge** – Rule 2218 (3)(d) and (e)

The permittee, if proposing to modify the quantity or effluent characteristics of the discharge, if proposing to modify the monitoring program, or if proposing to modify the treatment process for the discharge, shall notify the Department of the proposed modification before it occurs. The Department shall determine if the proposed modification requires the permit to be modified to ensure that the terms of Rule 2204 are met. Modifications determined by the Department to be significant require that the permittee submit an application for and obtain a reissuance of the permit before such modification occurs.

K. By-Passing

Any diversion from or bypass of facilities necessary to maintain compliance with the terms and conditions of this permit is prohibited, except where unavoidable to prevent loss of life, personal injury, or severe property damage. The permittee shall immediately notify the Department of any such occurrence by telephone at 1-800-292-4706. Such notice shall be supplemented by a written report with the next operation report detailing the cause of such diversion or bypass and the corrective actions taken to minimize adverse impact and eliminate the need for future diversion or bypass.

L. Cessation of Discharge-Related Activities

If all or any portion of the permitted treatment facilities and discharge areas are intended to be eliminated, the permittee shall comply with the requirements of Rule 2226.

NOTE:

IF THE PERMITTEE WISHES TO CONTINUE DISCHARGING BEYOND THE EXPIRATION DATE, THE PERMITTEE SHALL SUBMIT A COMPLETE APPLICATION FOR REISSUANCE NO LATER THAN 180 DAYS PRIOR TO THE EXPIRATION DATE IN ACCORDANCE WITH RULE 2151 OF THE PART 21 ADMINISTRATIVE RULES. FAILURE TO SUBMIT AN ADMINISTRATIVELY COMPLETE APPLICATION FOR REISSUANCE BY THE REQUIRED DATE WILL RESULT IN TERMINATION OF THE AUTHORIZATION TO DISCHARGE ON THE EXPIRATION DATE.

Exemption 9 applies to pages 33-34

FedEx Express **USA Airbill**

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Form I.D. No. 0200

1 From *Please print and press hard.*

Date JULY 6, 2002 Sender's FedEx Account Number

Sender's Name ANDREW SMITS Phone (231) 933-4041

Company INLAND SEAS ENGINEERING, INC.

Address P.O. BOX 6820, 1755 BARLOW ST. Dept/Floor/Suite/Room

City TRAVERSE CITY State MI ZIP 49696-6820

2 Your Internal Billing Reference
First 24 characters will appear on invoice.

3 To

Recipient's Name MR. RICHARD POWERS Phone (517) 373-0000

Company MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

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4a Express Package Service *Packages up to 150 lbs.* Delivery commitment may be later in some areas.

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- ☐ FedEx Express Saver — Third business day

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4b Express Freight Service *Packages over 150 lbs.* Delivery commitment may be later in some areas.

- ☐ FedEx 1Day Freight* — Next business day
- ☐ FedEx 2Day Freight — Second business day
- ☐ FedEx 3Day Freight — Third business day

* Call for Confirmation: _____

5 Packaging * Declared value limit $500

- ☐ FedEx Envelope*
- ☐ FedEx Pak* — Includes FedEx Small Pak, FedEx Large Pak, and FedEx Sturdy Pak
- ☐ Other

6 Special Handling Include FedEx address in Section 3

- ☐ SATURDAY Delivery — Available ONLY for FedEx Priority Overnight and FedEx 2Day to select ZIP codes
- ☐ HOLD Weekday at FedEx Location — NOT Available for FedEx First Overnight
- ☐ HOLD Saturday at FedEx Location — Available ONLY for FedEx Priority Overnight and FedEx 2Day to select locations

Does this shipment contain dangerous goods? One box must be checked.

- ☐ No
- ☐ Yes — As per attached Shipper's Declaration
- ☐ Yes — Shipper's Declaration not required
- ☐ Dry Ice — Dry Ice, 9, UN 1845 ____ x ____ kg

Dangerous Goods (including Dry Ice) cannot be shipped in FedEx packaging.

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- ☐ Recipient
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		$ .00

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